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Sheldrake/R10/USEPA/US

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Subject Discussion with AMEC regarding Rhone Poulenc

PH Rhone Poulenc  
PORSIF

11.3.50  
5/11/07

All,

I wanted to let you know that I talked with Sean Gormelly with AMEC, after talking with Kristine.

I informed him of the following concerns held by EPA:

1. EPA views their current source control efforts as wholly inadequate, both in geographic scope, and with respect to targeted contaminants.
2. EPA is not particularly swayed by impact to the river or not (though impact to the river sediment or water column speaks to an immediacy need for s/c). S/c will be required even absent river impact simply due to the potential for river impact, and the impact to the aquifer by itself.
3. A two tier complete hydraulic control system is what EPA would require --one hydraulic control system near the river, one closer to the site.
4. EPA will be evaluating their sediments near the RR bridge relative to their early action status, or relative to being added to other contemplated early actions, like GASCO/Siltronic and Arkema.
5. EPA would appreciate having documents sent directly to us-ideally to myself or Kristine to distribute (pdf at least, or pdf and hardcopy). EPA currently has limited information on their site and their plans.
6. If significant progress is not made asap (I went over this several times, even with several more disputes, they are already too late in starting hydraulic control due to the tail plume that will be left in TZW when we ostensibly tackle dredging), EPA will be forced to issue another order to Rhone Poulenc (RP) to ensure recontamination potential near the Arkema early action area is controlled.
7. I suggested that the earlier conventional, aggressive technologies are applied at this site, the less likely they will have the embarrassing task of trying to explain to the CAG (ala NWN and Arkema's recent challenges), just what (little) they have been doing with their time.

In short, RP is way behind on this, and needs to catch up quickly to not raise enough attention on EPA's part to warrant a separate order for site characterization and removal action.

Kristine, would you like to talk this over with Jim and the s/c PM, or would you prefer I do? Let me know...

S

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